

**FISHER & PHILLIPS LLP**  
 300 S. Fourth Street, Suite 1500  
 Las Vegas, Nevada 89101

FISHER & PHILLIPS LLP  
 SCOTT M. MAHONEY, ESQ.  
 Nevada Bar No. 1099  
 300 S. Fourth Street  
 Suite 1500  
 Las Vegas, NV 89101  
 Telephone: (702) 252-3131  
 E-Mail Address: [smahoney@fisherphillips.com](mailto:smahoney@fisherphillips.com)  
 Attorneys for Defendant Holder Construction Group, LLC

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SONNY GUBBINE,	)	Case No. 2:21-cv-02078-JAD-EJY
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>EXTEND SCHEDULING</b>
v.	)	<b>ORDER DEADLINES</b>
	)	<b>(Sixth Request)</b>
HOLDER CONSTRUCTION GROUP,	)	
LLC, a Georgia Limited Liability Company;	)	
TEG STAFFING, INC. d/b/a EASTRIDGE	)	
WORKFORCE SOLUTIONS, a California	)	
Corporation; DOES I-X; ROE BUSINESS	)	
ENTITIES I-X,	)	
	)	
Defendants.	)	
	)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	October 27, 2023
Dispositive Motion Deadline	November 27, 2023
Joint Pretrial Order	December 27, 2023, or 30 days from the ruling on a dispositive motion

This is the sixth request for an extension of these deadlines. The parties provide the following information about the proposed discovery deadline extension.

///

///

***Discovery Completed to Date***

The parties have served their Initial Disclosures and supplements thereto. Defendant has served interrogatories and a request for production and Plaintiff has responded. Defendant has subpoenaed and received documents from TEG Staffing and several medical care providers. Plaintiff was deposed on February 10, 2023. A Rule 30(b)(6) deposition for TEG has occurred.

***Remaining Discovery to Be Completed***

The depositions of current and former employees of Defendants and other third-party witnesses, a Rule 30(b)(6) deposition of Holder Construction Group, LLC, as well as further written discovery.

***Reasons Discovery Could Not Be Completed Within the Existing Deadline***

Defense counsel was recently in the hospital for 11 days and is recuperating and receiving ongoing therapy at home, working only a limited part-time schedule at the present.

***Proposed Dates for Completion of Discovery***

The parties believe they will be able to complete discovery by the proposed new date of October 27, 2023.

KEMP & KEMP

FISHER & PHILLIPS LLP

By: /s/ James P. Kemp, Esq.  
 7435 W. Azure Dr., Suite 110  
 Las Vegas, Nevada 89130  
 Attorneys for Plaintiff

By: /s/ Scott M. Mahoney, Esq.  
 300 South Fourth Street #1500  
 Las Vegas, Nevada 89101  
 Attorneys for Defendant

**IT IS SO ORDERED.**

Clayton L. Zouchak  
 U.S. MAGISTRATE JUDGE

Dated: July 14, 2023